

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff

v.

**A. \$1,000,000.00 CONTAINED IN
CHARLES SCHWAB & CO., INC.
ACCOUNT #9991-8933, IN THE
NAME OF DONALD KEITH
ELLISON, SEIZED ON APRIL 26,
2019, et. al.,**

Defendants.

CIVIL NO. 19-1693 (ADC)

**UNITED STATES' MOTION TO UNSEAL CIVIL FORFEITURE COMPLAINT AND
TO RESTRICT UNSWORN DECLARATION**

TO THE HONORABLE COURT:

COMES NOW, the United States of America, by the undersigned attorneys, and very respectfully states and prays as follows:

1. On July 19, 2019, the United States filed a Motion to Seal Civil Forfeiture Case pursuant to Rule 5.2(d) of the Federal Rules of Civil Procedure. See Docket No. 1.
2. Upon further review, the United States submits that the Verified Complaint for Forfeiture In Rem does not have to be sealed. Therefore, it is respectfully requested that the Verified Complaint for Forfeiture In Rem at Docket No. 2 be unsealed and that the Unsworn Declaration filed in support of the aforementioned complaint at Docket No. 2-1 remain sealed, limiting viewing to the United States and the Court. Said Unsworn Declaration reveals information that may adversely affect an ongoing investigation.

Civil No. 19-1693 (ADC)

WHEREFORE, the United States respectfully prays the Court to grant this request and unseal the Verified Complaint for Forfeiture In Rem at Docket No. 2, and that an ORDER issue directing that the Unsworn Declaration to remain under such restriction level until further order by the Court.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 24th day of July 2019.

ROSA EMILIA RODRIGUEZ-VELEZ
United States Attorney

s/David O. Martorani-Dale

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 24th day of July 2019.

s/David O. Martorani-Dale
David O. Martorani-Dale
Assistant U.S. Attorney